

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOANNE GLADYS CARDONA
FRONTERA

DEBTOR

CASE NO 14-00427 ESL

CHAPTER 13

**DEBTOR'S MOTION IN COMPLIANCE WITH
ORDER GRANTING UNOPPOSED MOTION
DOCKET NO. 33**

TO THE HONORABLE COURT:

COMES NOW, JOANNE GLADYS CARDONA FRONTERA, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On February 23, 2018 this Honorable Court issued an ORDER GRANTING UNOPPOSED MOTION Docket No. 33, whereby the Court granted the Chapter 13 Trustee's motion on non delivery of 2014, 2015 and 2016 tax refunds (Docket No. 27) and Ordered the Debtor to comply within fourteen (14) days. ORDER GRANTING UNOPPOSED MOTION Docket No. 33.

2. That the Debtor sent to the Chapter 13 Trustee (up-loaded to Trustee's system) a copy of the Debtor's 2014, 2015 and 2016 tax returns.

3. The Debtor respectfully submits that on January 31, 2018 the Debtor filed a post-confirmation modified Plan in order to amend the "tax refund provision" in the confirmed Plan to provide as follows:

"Part 8 Non Standard Provisions

This Section modified LBF-G Part 2 Section 2.3.

Page -2-
Motion to Comply ORDER
Case no. 14-00427 ESL13

Income tax refunds provision:

The Debtor will supply the Trustee with a copy of each tax return filed during the life of the Plan; pursuant to Trustee's recommendation the Debtor may retain all tax refunds received during the life of the Plan. See Minutes of 341 Meeting of Creditors, Docket No. 10." Debtor's Notice of Filing a Post-Confirmation Modification of Chapter 13 Plan, Docket No. 28.

4. That on February 14, 2018, the Chapter 13 Trustee filed a favorable recommendation of the Debtor's proposed modified Plan, Docket No. 29.

5. It is to be noted that the Debtor filed a second post-confirmation modification of Chapter 13 Plan, in order to increase the Plan's monthly payment and, consequently, the proposed Plan base. See Debtor's Notice of Filing a Post-Confirmation Modification of Chapter 13 Plan, Docket No. 30. The proposed "tax refund" provision stays as previously amended, Docket No. 28.

6. Based on the above stated, the Debtor respectfully requests that this Honorable Court be informed of the foregoing and grant the present motion in compliance with this Court's ORDER GRANTING UNOPPOSED MOTION, Docket No. 33, in the above captioned case.

WHEREFORE, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion in compliance with this Court's ORDER, Docket No. 33, in the above captioned case.

Page -3-
Motion to Comply ORDER
Case no. 14-00427 ESL13

I **CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq., and to all CM/ECF participants; I also certify that a copy of this motion was sent via US Mail to the Debtor Joanne Gladys Cardona Frontera, Urb Bairoa DP 16 40th Street Caguas PR 00725.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 05th day of March, 2018.

/s/ Roberto Figueroa Carrasquillo

USDC #203614

RFIGUEROA CARRASQUILLO LAW OFFICE PSC

ATTORNEY FOR PETITIONER

PO BOX 186 CAGUAS PR 00726

TEL NO 787-744-7699 FAX 787-746-5294

Email: rfigueroa@rfclawpr.com